



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE, TENNESSEE 37243-0435

SHARI MEGHREBLIAN, PhD
COMMISSIONER

BILL HASLAM
GOVERNOR

December 18, 2018

Via Electronic Mail to wdwhite0@tva.gov

Attn: W. Douglas White, Senior Specialist
Tennessee Valley Authority
400 West Summit Hill Dr., W T 11D
Knoxville, Tenn. 37902

Dear Mr. White:

The Tennessee Department of Environment and Conservation (TDEC) appreciates the opportunity to provide comments on the Tennessee Valley Authority (TVA) *Watts Bar Reservoir Land Management Plan (RLMP) Draft Supplemental Environmental Assessment (SEA)* which proposes to change the land use allocations for public land on Watts Bar Reservoir in Rhea and Roane counties in east Tennessee. This environmental review is a supplement to the 2009 Watts Bar RLMP and Environmental Impact Statement and is intended to respond to new issues and changes in conditions and circumstances while identifying and evaluating the most suitable use of public land under TVA stewardship.¹ TVA proposes to change the land use allocations on six parcels affecting approximately 226 acres of the 13,425 acres (0.02 percent) of Watts Bar reservoir. The Draft SEA considers the environmental impacts associated with the proposed modifications to the land use allocations for the following six parcels or portions of parcels:

Parcel	Acreage	Current Allocation	Proposed Allocation Change Description
89	35	Zone 4—Natural Resource Conservation	Change 0.4-acre portion (new Parcel 89a) of the 35.0-acre Parcel 89 to Zone 7 — Shoreline Access
144	172.3	Zone 3—Sensitive Resource Management	Change entire 172.3-acre parcel to Zone 2 — Project Operations
153	40.6	Excluded from 2009 RLMP	Change entire 40.6-acre parcel to Zone 7 — Shoreline Access
197	36.8	Zone 7—Shoreline Access	Change 10.2-acre portion (new Parcel 197a) of the 36.8-acre Parcel 197 to Zone 6 — Developed Recreation
256	34.2	Zone 7—Shoreline Access	Change 0.1-acre portion (new Parcel 256a) of the 34.2-acre Parcel 256 to Zone 4 — Natural Resource Conservation
271	14	Zone 4—Natural Resource Conservation	Change 2.4-acre portion (new Parcel 271a) of the 14.0-acre Parcel 271 to Zone 6 — Developed Recreation

¹ For more information on the 2009 Watts Bar RLMP and Environmental Impact Statement, please visit <https://www.tva.gov/Environment/Environmental-Stewardship/Land-Management/Watts-Bar-Reservoir-Land-Management-Plan>.

TDEC has reviewed the Draft SEA and has the following comments:

Cultural and Natural Resources

TDEC believes the Draft SEA adequately addresses potential impacts to cultural and natural resources within the proposed project area.²

Water Resources

TDEC advises that any activities which will disturb more than one acre of land must have a National Pollution Discharge Elimination System Stormwater Construction Permit; any activities affecting streams or wetlands must have an Aquatic Resource Alteration Permit, including an increase in water withdrawals; and depending on the activity and the size of the disturbance, a hydrologic determination by a certified hydrologic professional might be necessary to identify all of the aquatic resources within the project limits of disturbance to determine the impact to water resources.

TDEC appreciates the opportunity to comment on this Draft SEA. Please note that these comments are not indicative of approval or disapproval of the proposed action or its alternatives, nor should they be interpreted as an indication regarding future permitting decisions by TDEC. Please contact me should you have any questions regarding these comments.

Sincerely,



Kendra Abkowitz, PhD
Assistant Commissioner, Office of Policy and Sustainable Practices
Tennessee Department of Environment and Conservation
Kendra.Abkowitz@tn.gov
(615) 532-8689

cc: Daniel Brock, TDEC, DOA
Tom Moss, TDEC, DWR
Stephanie Williams, TDEC, DNA

² This is a state-level review only and cannot be substituted for a federal agency Section 106 review/response. Additionally, a court order from Chancery Court must be obtained prior to the removal of any human graves. If human remains are encountered or accidentally uncovered by earthmoving activities, all activity within the immediate area must cease. The county coroner or medical examiner, a local law enforcement agency, and the state archaeologist's office should be notified at once (Tennessee Code Annotated 11-6-107d).